#### **PUBLIC DISCLOSURE**

January 31, 2001

#### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

#### NORTHEAST COMMUNITY CREDIT UNION

100 LAFAYETTE SQUARE HAVERHILL, MA 01831

DIVISION OF BANKS ONE SOUTH STATION BOSTON, MA 02110

NOTE:

This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

#### **GENERAL INFORMATION**

The Community Reinvestment Act (CRA) requires the Division of Banks (Division) to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the needs of its assessment area, including low and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the Division must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Northeast Community Credit Union** prepared by the Massachusetts Division of Banks, the institution's supervisory agency, as of January 31, 2001.

# **INSTITUTION'S CRA RATING:** This institution is rated "Satisfactory"

The credit union's overall CRA rating is based on its performance in the five performance criteria of the small institution examination: Loan-to-Deposit Ratio, Lending Inside the Assessment Area, Lending to Borrowers of Different Incomes, Geographic Distribution of Loans, and Fair Lending.

The credit union's loan-to-deposit (share) ratio averaged 83.4 percent over the last two years. Further, the credit union demonstrated a higher loan-to-deposit (share) ratio when compared to other institutions operating within its assessment area. The credit union exceeds the standards for satisfactory performance for this criterion. Northeast Community Credit Union granted 59.3 percent of its residential loans and 72.0 percent of its consumer loans by number inside the assessment area. The distribution of loans inside the assessment area is considered to meet the standards for satisfactory performance. The credit union's distribution of loans among borrowers and geographies of different incomes is reasonable. Finally, the credit union has not received any complaints pertaining to its CRA performance and fair lending policies and practices are adequate.

# **Description of Institution**

Northeast Community Credit Union (NCCU) was chartered in 1934 under the laws of the Commonwealth of Massachusetts. Historically the credit union was formed to serve the Italian-American community of Haverhill; however, it has since revised its field of membership to become a community-based credit union. Membership is open to all who live or work within Essex or Middlesex Counties and contiguous New Hampshire communities. The credit union has one office, located at 100 Lafayette Square, Haverhill, Massachusetts.

As of December 31, 2000, the credit union had total assets of \$67.8 million. Gross loans totaled \$48.9 million, representing approximately 72.1 percent of total assets. Of these loans, 80.5 percent were comprised of real estate loans, 11.8 percent were automobile loans, 4.0 percent were unsecured loans, and 3.7 percent constitute other loans. The credit union's average loan-to-share ratio is 83.4 percent.

Competition in the area is very strong and the market influence from these institutions appears to be significant, and as a result, keeps the credit union's rates and services offered competitive.

In 1999, the top six mortgage lenders within the credit union's assessment area were Countrywide Home Loans, Family Bank, FSB, Norwest Funding, Inc., SIB Mortgage Corp., Pentucket Five Cents Savings Bank, and Bank of America, N.A. These top six lenders held a 27.3 percent market share of all mortgage loan originations reported under the Home Mortgage Disclosure Act (HMDA).

The previous evaluation performed by the Commonwealth of Massachusetts on April 13, 1998 assigned a rating of "Satisfactory".

# **Description of Assessment Area**

The Community Reinvestment Act (CRA) requires financial institutions to define an assessment area within which the credit union will focus its lending efforts. The Division of Banks evaluates the institution's CRA performance based on the defined assessment area.

NCCU defines its assessment area as the City of Haverhill, which is one of the oldest historic communities in the state. This assessment area is located within the Lawrence, MA-NH Metropolitan Statistical Area (MSA). Haverhill is approximately 36 square miles and contains a wide variety of land uses ranging from rural, agricultural areas to urban areas. Recently, computer technology and research firms have located within Haverhill's industrial parks and business districts.

According to 1990 US Census Data, NCCU's assessment area has a total population of 51,418 individuals. The assessment area consists of 11 census tracts. Census tracts are defined as either low, moderate, middle or upper-income based on median Family

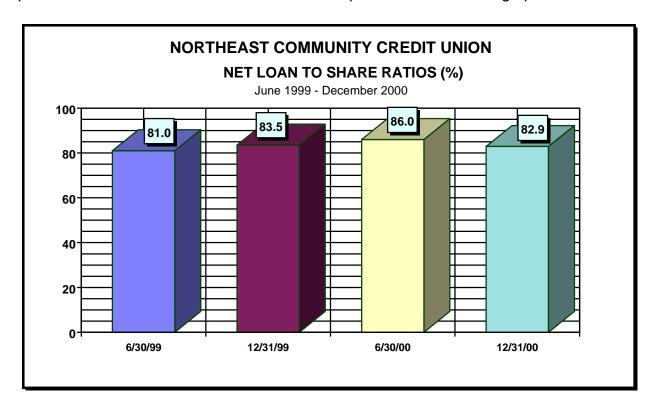
Household Income (FHI) within the census tract. The Lawrence, MA-NH median Family Household Income (FHI) was \$57,900 for 1999 and \$60,800 for 2000. The census tract breakdown for NCCU is as follows: 1 or 9.1 percent designated as low-income, 3 or 27.3 percent designated as moderate-income and 7 or 63.6 percent designated as middle-income. There are no upper-income census tracts within the assessment area.

There are 21,321 housing units within the assessment area, of which 53.8 percent are owner-occupied, 38.0 percent are rental and 8.2 percent are vacant. Housing stock within the assessment area is primarily one to four-family residential units. The median home value of the assessment area is \$135,510 based on 1990 census data.

# **PERFORMANCE CRITERIA**

# 1. LOAN-TO- DEPOSIT (SHARE) ANALYSIS

An analysis of NCCU's loan-to-share ratio was performed during the examination. The calculation incorporated the net loan to total share ratios derived from the previous four semi-annual N.C.U.A. 5300 Call Reports. This review included the reports from June 30, 1999 through December 31, 2000. The institution's average loan-to-share ratio for the period under review was determined to be 83.4 percent. Refer to the graph below.



Some fluctuation in the ratios has occurred over the past two years; however, these ratios have increased since the previous examination period. The slight fluctuation stems from an increase in loans at the beginning of the year for holiday debts. There is also an increase in withdrawals during tax season.

The following table compares the net loan-to-share ratio of two other institutions in the assessment area. The ratios ranged from 83.4 percent to 61.8 percent for September 30, 2000. The institutions are listed with the net loan-to-deposit ratios in descending order.

Institution	Net Loan To Share Ratio
Northeast Community Credit Union	83.4
Pentucket Five Cents Savings Bank	66.8
Haverhill Co-operative Bank	61.8

Based on the above information, the credit union's asset size and resources, competition, and the credit needs of the membership, the loan-to share ratio is considered strong and exceeds the standards for satisfactory performance.

# 2. COMPARISON OF CREDIT EXTENDED INSIDE AND OUTSIDE OF THE ASSESSMENT AREA

# **Residential Lending**

NCCU's 1999 and 2000 Loan Application Registers (LARs) were reviewed to determine the amount of credit extended within the credit union's assessment area. During this period, the credit union originated 162 HMDA-reportable loans totaling approximately \$18,193,000. Of these loans, 96 or 59.3 percent totaling \$10,518,000 or 57.8 percent of the dollar amount, were originated inside the credit union's assessment area.

Refer to the following tables for additional information regarding the credit union's HMDA-reportable lending, by both number and dollar amount.

# **HMDA-Reportable Loans by Number of Originations**

Location	1999		20	00	Total	
	#	%	#	%	#	%
Inside Assessment Area	61	55.5	35	67.3	96	59.3
Outside Assessment Area	49	44.5	17	32.7	66	40.7
Total	110	100.0	52	100.0	162	100.0

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/00

# **HMDA-Reportable Loans by Dollar Amount of Originations**

	1999		20	00	Total	
Location	\$(000)	%	\$(000)	%	\$(000)	%

Inside Assessment Area	6,229	52.4	4,289	68.0	10,518	57.8
Outside Assessment Area	5,658	47.6	2,017	32.0	7,675	42.2
Total	11,887	100.0	6,306	100.0	18,193	100.0

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/00

As depicted above, the majority of the residential lending was originated within the assessment area. Management indicated that the large decline in loan originations in the Year 2000 from the previous year was the result of a substantial decrease in the number of refinances.

# **Consumer Lending**

A review of the consumer loan portfolio indicated that the credit union extended 738 consumer loans in 1999 and 750 consumer loans in 2000. A sample of 100 approved consumer loans was reviewed in order to analyze the distribution within the assessment area. This sample consisted of 50 loans from 1999 and 50 loans from 2000. The sample was comprised of a mixture of unsecured loans, share secured loans, lines of credit, automobile loans and educational loans. Refer to the following tables.

#### Sample of Consumer Loan Originations By Number

Location	1999		20	000	Total		
	# %		#	%	#	%	
Inside Assessment Area	36	72.0	36	72.0	72	72.0	
Outside Assessment Area	14	28.0	14	28.0	28	28.0	
Total	50	100.0	50 100.0		100	100.0	

Source: Consumer loan sample data for the period 1/1/99 to 12/31/00.

#### Sample of Consumer Loan Originations By Dollar Amount

Location	1999		20	00	Total		
	\$(000) %		\$(000)	%	\$(000)	%	
Inside Assessment Area	149	63.9	149	74.5	298	68.8	
Outside Assessment Area	84	36.1	51	25.5	135	31.2	
Total	233	100.0	200	100.0	433	100.0	

Source: Consumer loan sample data for the period 1/1/99 to 12/31/00.

As indicated in the above tables, the majority of consumer loans (72.0 percent by number and 68.9 percent by dollar amount) were originated inside the credit union's assessment area.

Based on the above information, the credit union's penetration of the assessment area with respect to HMDA reportable loans and consumer loans is considered to meet the standards for satisfactory performance.

#### 3. DISTRIBUTION OF CREDIT AMONG DIFFERENT INCOME LEVELS

# **Residential Lending**

The credit union's residential loans were further analyzed to determine the distribution of lending by borrower income level. The borrowers' reported incomes were compared to the median family incomes for the Lawrence MA-NH Metropolitan Statistical Area (MSA) based on the location of the property. These income figures are based on estimated Department of Housing and Urban Development (HUD) information.

Low-income is defined by the US Census Bureau as income below 50 percent of the median family income level for the MSA. Moderate-income is defined as income between 50 percent and 79 percent of the median family income level for the MSA. Middle-income is defined as income between 80 percent and 119 percent of the median family income level for the MSA. Upper-income is defined as income equal to or greater than 120 percent of the median family income level for the MSA.

The following tables depict by number and dollar amount, HMDA-reportable loans to low, moderate, middle and upper-income borrowers in comparison to the number of families in the assessment area in each respective income group.

# <u>Distribution of HMDA Loans to Borrowers of Different Income Levels</u>

Borrower	Total Families		1	1999		2000		Total	
Income Level	#	%	#	%	#	%	#	%	
< 50%	3,139	23.1	5	8.2	4	11.4	9	9.4	
50 - 79%	2,380	17.5	15	24.6	3	8.6	18	18.8	
80 - 119%	3,893	28.7	13	21.3	16	45.7	29	30.2	
> = 120%	4,170	30.7	27	44.3	12	34.3	39	40.6	
NA	0	0.0	1	1.6	0	0.0	1	1.0	
Total	13,582	100.0	61	100.0	35	100.0	96	100.0	

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/00

# **Dollar Amount of HMDA Loans to Borrowers of Different Income Levels**

Borrower	Borrower Total Familie		199	200	0	Total		
Income Level	#	%	\$ (000)	%	\$ (000)	%	\$ (000)	%
< 50%	3,139	23.1	375	6.0	422	9.8	797	7.6
50 - 79%	2,380	17.5	1,367	21.9	347	8.1	1,714	16.3
80 - 119%	3,893	28.7	1,307	21.0	1,799	42.0	3,106	29.5
> = 120%	4,170	30.7	3,080	49.5	1,721	40.1	4,801	45.6
NA	0	0.0	100	1.6	0	0.0	100	1.0
Total	13,582	100.0	6,229	100.0	4,289	100.0	10,518	100.0

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/00

As shown in the above tables, the credit union extended 9 loans to low-income members representing 9.4 percent by number. These loans represent 7.6 percent by dollar amount of the credit union's total originations within its assessment area. Both percentages fall below the percentage of total families in the low-income category.

In addition, the credit union extended 18 loans to moderate-income borrowers, representing 18.8 percent by number and 16.3 percent by dollar amount. The

percentage of loans is comparable to the 17.5 percent of moderate-income families within this group.

The distribution of the credit union's residential loans among various borrower income levels may also be compared to that of all other HMDA-reporting lenders in the assessment area. Other HMDA-reporters include bank and non-bank entities such as large national banking companies, other local banks, credit unions and mortgage companies. The most recent data available for this analysis relates to calendar year 1999 and is presented in the following table.

<u>Lending to Borrowers of Different Income Levels</u>

Northeast Community Credit Union Compared to All Other HMDA-Reporters

Borrower		Number	of Loans		D	ollar Amo	unt of Loan	s
Income Level	Northeast All Other Community Reporters Credit Union			Commun	neast ity Credit ion	All Other Reporters		
	#	%	#	%	\$(000)	%	\$(000)	%
< 50%	5	8.2	180	5.4	375	6.0	12,738	3.4
50 - 79%	15	24.6	681	20.6	1,367	21.9	63,031	17.0
80 - 119%	13	21.3	907	27.5	1,307	21.0	101,563	27.5
> = 120%	27	44.3	878	26.6	3,080	49.5	118,349	32.0
NA	1	1.6	656	656 19.9		1.6	74,361	20.1
Total	61	100.0	3,302	100.0	6,229	6,229 100.0		100.0

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/99.

The distribution of the credit union's residential loans to low-income borrowers is higher than that of the aggregate. As shown above, the credit union's percentage of lending to borrowers of low income was 8.2 percent by number and 6.0 percent by dollar amount compared to that of the aggregate with 5.4 percent by number and 3.4 percent by dollar amount.

NCCU's HMDA-reportable loans to moderate-income borrowers accounted for 24.6 percent by number and 21.9 percent by dollar amount. This percentage also exceeds that of the aggregate, which granted 20.6 percent of total loans by number and 17.0 percent by dollar amount to moderate-income borrowers.

# **Consumer Lending**

An analysis of the sample of consumer loans for 1999 and 2000 was conducted to determine the distribution of credit based upon the income levels of borrowers within the assessment area. Income levels were categorized by the ratio of the applicant's reported income to the estimated 1999 and 2000 median family incomes of the MSA. The following table provides a breakdown of consumer loans by applicant income level.

#### **Number of Consumer Loan Originations by Income of Borrower**

% of Median	19	99	20	000	Total		
MSA Income	#	%	#	%	#	%	
<50%	19	52.8	12	33.3	31	43.1	
50% - 79%	10	27.8	12	33.3	22	30.6	
80% - 119%	5	13.9	9	25.0	14	19.4	
>=120%	2	5.5	3	8.4	5	6.9	
Total	36	100.0	36	100.0	72	100.0	

Source: Consumer loan sample data for the period 1/1/99 to 12/31/00.

#### **Dollar Amount of Consumer Loan Originations by Income of Borrower**

% of Median	1999		20	00	Total		
MSA Income	\$(000)	%	\$(000)	%	\$(000)	%	
<50%	77	51.7	22	14.8	99	33.2	
50% - 79%	49	32.9	48	32.2	97	32.6	
80% - 119%	14	9.4	66	44.3	80	26.8	
>=120%	9	6.0	13	8.7	22	7.4	
Total	149	100.0	149	100.0	298	100.0	

Source: Consumer loan sample data for the period 1/1/99 to 12/31/00.

The above tables indicate that 43.1 percent of the loans were made to low-income members and 30.6 percent to moderate-income members. While demonstrating a strong penetration of loans to low and moderate-income members, it should be noted that consumer loans typically consider only the income of one applicant while the comparison is based on median family income of the area. Thus, the distribution by income level may be somewhat inflated within the low and moderate-income levels.

Based upon the analysis of the distribution of loans among different income levels and considering the above factors, NCCU's HMDA-reportable and consumer lending is considered to meet the standards for satisfactory performance.

#### 4. GEOGRAPHIC DISTRIBUTION OF LOANS

#### **Residential Lending**

The HMDA-reportable loans located within the credit union's assessment area were further analyzed to determine their location by census tract income level. The assessment area is comprised of 11 census tracts.

The following tables provide a breakdown, by number and dollar amount, of the credit union's HMDA-reportable loans.

#### Distribution of HMDA Loans by Census Tract Income Level

Census Tract Income Level	Owner-Occupied Properties		1	1999		2000		Total	
	#	%	# %		#	%	#	%	
Low	292	2.5	1	1.6	1	2.8	2	2.1	
Moderate	1,399	12.2	10	16.4	5	14.3	15	15.6	
Middle	9,787	85.3	50	82.0	29	82.9	79	82.3	
Total	11,478	100.0	61	100.0	35	100.0	96	100.0	

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/00

## **Dollar Volume of HMDA Loans by Census Tract Income Level**

Census Tract Income Level	Owner-Occupied Properties		1999		2000		Total	
	#	%	\$ (000)	%	\$ (000)	%	\$ (000)	%
Low	292	2.5	45	0.7	85	2.0	130	1.2
Moderate	1,399	12.2	942	15.1	460	10.7	1,402	13.3
Middle	9,787	85.3	5,242	84.2	3,744	87.3	8,986	85.5
Total	11,478	100.0	6,229	100.0	4,289	100.0	10,518	100.0

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/00

As shown in the above tables, the credit union extended 17.7 percent of its loans within low and moderate-income census tracts.

In 1999 and 2000, 2 loans representing 2.1 percent of the number of the credit union's total loans were granted within the low-income census tract. This represents 1.2 percent of the total dollar volume. However, this tract is within the business district in downtown Haverhill, which has a high concentration of commercial, retail and multifamily units. The characteristics of the tract limit one-to-four family residential lending opportunities. The number of loans is slightly below the 2.5 percent of owner-occupied properties within low-income census tracts in the assessment area.

Additionally, 15 loans or 15.6 percent were within moderate-income census tracts. The distribution by dollar amount to moderate-income census tracts was 13.3 percent. The number of loans is comparable to the 12.2 percent of owner-occupied properties within moderate-income census tracts in the assessment area.

NCCU's lending performance by census tract income level was also compared to the performance of all other HMDA-reporting lenders in the assessment area. The most recent data available for this analysis relates to calendar year 1999 and is presented in the following table.

# <u>Lending Within the Assessment Area by Census Tract Income Level</u> Northeast Community Credit Union Compared to All Other HMDA Reporters

Census	Number of Loans	Dollar Amount of Loans
Tract		
Income	9	
Level		

	Northeast Community Credit Union		All Other Reporters		Northeast Community Credit Union		All Other Reporters	
	#	%	#	%	\$(000)	%	\$(000)	%
Low	1	1.6	141	4.3	45	0.7	17,743	4.8
Moderate	10	16.4	440	13.3	942	15.1	42,563	11.5
Middle	50	82.0	2,721	82.4	5,242	84.2	309,736	83.7
Total	61	100.0	3,302	100.0	6,229	100.0	370,042	100.0

Source: HMDA/LAR Data for the period 1/1/99 to 12/31/99.

According to this analysis, the percentage of NCCU's lending activity in the low and moderate-income census tracts was 18.0 percent by number and 15.8 percent by dollar amount. By comparison, the aggregate originated 17.6 percent by number and 16.3 percent by dollar amount in the low and moderate-income census tracts.

# **Consumer Lending**

A review of the consumer loan sample indicates that 16.7 percent by number and 20.8 percent by dollar amount of consumer loans were granted in the low-income census tract. The credit union's consumer loans in moderate-income census tracts represent 22.2 percent by number and 27.5 percent by dollar amount of total consumer loans in the assessment area. Refer to the following tables.

# <u>Distribution of Consumer Loan Originations by Census Tract Income Level</u>

Census Tract	19	1999		00	Total	
Income Level	#	%	#	%	#	%
Low	5	13.9	7	19.4	12	16.7
Moderate	6	16.7	10	27.8	16	22.2
Middle	25	69.4	19	52.8	44	61.1
Total	36	100.0	36	100.0	72	100.0

Source: Consumer loan sample data for the period 1/1/99 to 12/31/00.

## **Dollar Amount of Consumer Loan Originations by Census Tract Income Level**

Census Tract	19	1999		00	Total	
Income Level	\$	%	\$	%	\$	%
Low	22	14.8	40	26.8	62	20.8
Moderate	30	20.1	52	34.9	82	27.5
Middle	97	65.1	57	38.3	154	51.7
Total	149	100.0	149	100.0	298	100.0

Source: Consumer loan sample data for the period 1/1/99 to 12/31/00.

Based upon the above information, the credit union's geographic distribution of loans is reasonable and meets the standards for satisfactory performance.

#### 5. REVIEW OF COMPLAINTS AND FAIR LENDING POLICIES AND PRACTICES

#### REVIEW OF COMPLAINTS

A thorough review of the public comment file revealed that the credit union received no complaints pertaining to its performance in helping to meet credit needs in its assessment area since the previous examination.

#### FAIR LENDING POLICIES AND PRACTICES

Northeast Community Credit Union maintains a Fair Lending Policy, which adequately addresses the guidelines established by Regulatory Bulletin 2.3-101, the Division's Community Reinvestment and Fair Lending

# **Staff Training**

The entire staff views the video entitled *True Colors* on a yearly basis. Employees viewing the video sign a form that they understand the content and any questions that arise are answered.

# **Staff Composition and Compensation**

The credit union currently has a staff of 25 full and part-time employees, 3 of whom are minorities. Members of the staff are also fluent in a number of different languages including French, Italian, Armenian, Greek and Spanish. NCCU's loan administrators are paid on a salary basis, thereby encouraging loans of all sizes.

#### Outreach

Northeast Community Credit Union ascertains community credit needs through its continued support and involvement in community organizations. The credit union participates in several community-based organizations including The Haverhill Kiwanis, the Haverhill Boys Club, the Haverhill Rotary Club and the Haverhill Chamber of Commerce.

#### **Credit Products and Underwriting Standards**

The credit union reviews its credit products on an ongoing basis.

#### Marketing

NCCU advertises in the <u>Haverhill Gazette</u>, the <u>Lawrence Eagle-Tribune</u>, the <u>Merrimack Valley Chamber of Commerce</u>, and local church bulletins.

#### **Credit Education**

The credit union does not currently participate in any formal credit education programs.

# Counseling

NCCU counsels members who are having credit problems and need help with their finances.

#### **Second Review Practices**

The credit union currently does not have a formal second review policy, however the majority of denied loans are reviewed by the Board on a monthly basis.

#### **Internal Control Procedures**

NCCU does not have any formal internal control procedures.

#### **Minority Application Flow**

According to 1990 Census Data, the credit union's assessment area contained a total population of 51,418 individuals of which 7.5 percent are minorities. A review of residential loan applications was conducted in order to determine the number of applications the credit union received from minorities. In 1999 and 2000, the credit union received 96 residential loan applications from within its assessment area. During this period, 5 applications or 5.2 percent, were received from minorities and all were approved.

#### APPLICATION FLOW

Race	1	999	2	000	Total	
	#	%	#	%	#	%
American Indian	1	1.6	0	0.0	1	1.0
Asian	0	0.0	0	0.0	0	0.0
Black	0	0.0	0	0.0	0	0.0
Hispanic	2	3.3	2	5.7	4	4.2
Other	0	0.0	0	0.0	0	0.0
<b>Total Minority</b>	3	4.9	2	5.7	5	5.2
White	48	78.7	30	85.7	78	81.3
No Info	10	16.4	3	8.6	13	13.5
Total	61	100.0	35	100.0	96	100.0

The credit union's minority application flow for this period was compared with the 1999 aggregate data for all other HMDA reporters within the assessment area. Aggregate information indicated that of the 4,775 HMDA-reportable applications received from other institutions within the assessment area in 1999, 6.3 percent were from minorities. Of the total approved loans by the aggregate lenders, 5.7 percent were approvals for minority borrowers. Although, the bank's performance falls slightly below the aggregate by percentage of applications, its 5.2 percent of approved loans to minorities is in line with that of the aggregate with 5.7 percent.

Based upon the review of the credit union's public comment file and its performance relative to fair lending policies and practices, the institution meets the standards for satisfactory performance in this category.

# THE COMMONWEALTH OF MASSACHUSETTS

To the COMMISSIONER OF BANKS:

THIS IS TO CERTIFY, that the report of examination of the

# NORTHEAST COMMUNITY CREDIT UNION

for compliance with applicable			
Reinvestment Act (CRA), as of			
undersigned and the matters re	ferred to therein will h	ave our immediate att	ention.
			<del></del>
An	najority of the Board of	f Directors/Trustees	
Dated at	this	day of	20

# PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, and the Uniform Interagency Community Reinvestment Act (CRA) Guidelines for Disclosure of Written Evaluations require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (Address at main office)."

[Please Note: If the institution has more than one assessment area, each office (other than off-premises electronic deposit facilities) in that area shall also include the address of the designated office for that assessment area.]

4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agency, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.